

The Darrow Company, Inc.  
d/b/a: Darrow Wealth Management  
November 3, 2023

**FORM CRS/ FORM ADV PART 3**

Darrow Wealth Management is registered with the Securities and Exchange Commission as an investment adviser and, as such, we provide advisory services rather than brokerage services. Brokerage and investment advisory services and fees differ and it is important for you, our client, to understand the differences. Additionally, free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing. This document is a summary of the services and fees we offer to "retail" investors, which are natural persons who seek or receive services primarily for personal, family, or household purposes.

**What investment services and advice can you provide me?**

We are a fee-only wealth management firm that offers the following investment advisory services to retail investors: **Financial Modeling, Consulting Services and Investment Management Services**. Our Investment Management Services may include ongoing financial advisory services. Detailed information regarding our services, fees and other disclosures can be found in our Form ADV Part 2A, Items 4,5,7, and 8 by clicking this link: <https://adviserinfo.sec.gov/firm/brochure/105679>. We are held to a fiduciary standard that covers our entire investment advisory relationship with you. For example, we are required to monitor your portfolio, investment strategy, and investments on an ongoing basis.

**Account Monitoring:** If you open an investment account with our firm, as part of our standard service, we will monitor your investments on an ongoing basis which will include periodic account reviews, typically occurring on a quarterly basis. We also strive to meet with our clients on a semi-annual basis to discuss their financial situation and review their accounts.

**Investment Authority:** We manage investment accounts on a **discretionary** basis whereby **we will decide** which investments to buy or sell for your account. You may impose reasonable restrictions or mandates on the management of your accounts (e.g., limiting the types of securities that can be purchased in your account) as long as it does not materially impact the performance of a portfolio strategy or prove overly burdensome to its management effort.

**Investment Offerings:** While we primarily offer advice on mutual funds and exchange-traded funds ("ETFs"), we also provide advice on other types of investments. Our services are not limited to a specific type of investment or product.

**Account Minimums and Requirements:** In general, we require a minimum account size of \$2 million and/or impose a minimum annual fee of \$5,000 to open and/or maintain an advisory relationship, either of which may be waived in our discretion.

***Key Questions to Ask Your Financial Professional***

- **Given my financial situation, should I choose an investment advisory service? Why or Why Not?**
- **How will you choose investments to recommend to me?**
- **What is your relevant experience, including your licenses, education, and other qualifications?**
- **What do these qualifications mean?**

**What fees will I pay?**

The following summarizes the principal fees and costs associated with engaging our firm for investment advisory services. For detailed information, refer to our Form ADV Part 2A, Items 5 and 6 by clicking this link: <https://adviserinfo.sec.gov/firm/brochure/105679>.

- **Asset Based Fees** - Typically, payable quarterly in advance. Since the fees we receive are asset-based (i.e. based on the value of your account), we have an incentive to increase your account value, which creates a conflict.
- **Fixed Fees** - Payable in advance for Financial Modeling. Retirement Plan Consulting Services payable in arrears, while Estate Settlement, Discovery Support Services and Divorce Consulting Services payable in advance or paid in quarterly installments.
- **Additional Fees** - Clients will pay additional fees and/or expenses associated with mutual funds and

ETFs. Clients will also be responsible for paying the custodial/brokerage fees, account maintenance fees, and transaction charges if and when these fees apply. The most common fees and costs applicable to our clients are account maintenance fees and transaction charges.

***You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.***

***Key Questions to Ask Your Financial Professional***

- **Help me understand how these fees and costs might affect my investments. If I give you \$500,000 to invest, how much will go to fees and costs, and how much will be invested for me?**

**What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?**

***When we act as your investment adviser***, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide to you. Here is an example to help you understand what this means.

- Because our revenue is derived from asset-based fees, we have an incentive to grow your account as much as possible. This could cause us to take overly aggressive positions in conflict with your interests in an attempt to grow your account.

To help you understand what conflicts exist, refer to our Form ADV Part 2A, Items 4, 10, 11, 12, 14, and 20 by clicking this link: <https://adviserinfo.sec.gov/firm/brochure/105679>.

***Key Questions to Ask Your Financial Professional***

- **How might your conflicts of interest affect me, and how will you address them?**

**How do your financial professionals make money?**

The Firm's revenue is based on a percentage of client assets under management. Our financial professionals servicing your account(s) are compensated primarily on a salary basis, however a discretionary bonus may be given based upon a percentage of the management fees generated from net cash flows the Firm receives from new and existing client business. As a fee-only firm, we do not receive any revenue from selling any particular products.

**Do you or your financial professionals have legal or disciplinary history?**

No, our firm and our financial professionals currently do not have any legal or disciplinary history to disclose. Visit [Investor.gov/CRS](https://investor.gov/CRS) for a free and simple research tool.

***Key Questions to Ask Your Financial Professional***

- **As a financial professional, do you have any disciplinary history? For what type of conduct?**

You can find additional information about your investment advisory services and request a copy of the relationship summary at 978-369-5144 or click the link provided: <https://adviserinfo.sec.gov/firm/brochure/105679>.

***Key Questions to Ask Your Financial Professional***

- **Who is my primary contact person?**
- **Is he or she a representative of an investment adviser or a broker-dealer?**
- **Who can I talk to if I have concerns about how this person is treating me?**

**The Darrow Company, Inc.  
d/b/a: Darrow Wealth Management  
November 3, 2023**

**Exhibit to Form CRS/ FORM ADV PART 3**

Darrow Wealth Management is required to update its Form CRS when information in the Form CRS becomes materially inaccurate. This Exhibit summarizes the following material changes to the firm's Form CRS, implemented on October 9, 2023:

We have revised the following items:

- **What fees will I pay?** Our Investment Management fee, based upon the assets in your account, continues to be payable in advance. However, we have discontinued providing services based upon an hourly fee. Additionally, our Financial Modeling services are based upon a fixed fee and are payable in advance, while the fixed fee for our Retirement Plan Consulting Services fee are payable in arrears, and the fixed fee for our Discovery Support Services, Estate Settlement and Divorce Consulting Services are payable in advance or paid in quarterly installments.